

FILED
01-04-2024
CIRCUIT COURT
DANE COUNTY, WI
2023CV001310

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

In the Matter of the Rehabilitation of:

Wisconsin Reinsurance Corporation and 1st Auto &
Casualty Insurance Company
c/o: Office of the Commissioner of Insurance
125 South Webster Street
Madison, WI 53703

Case No. 2023CV1310

Case Code: 30703

BY: The Wisconsin Insurance Security Fund
2820 Walton Commons West
Suite 135
Madison, WI 53718-6797

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR INJUNCTIVE ORDER**

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

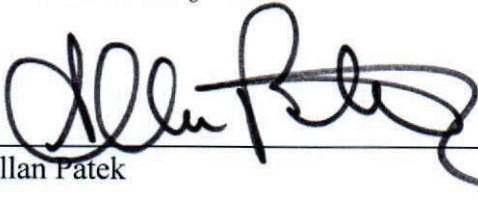
Allan Patek, being duly sworn on oath, deposes and says:

1. I am the Executive Director of the Wisconsin Insurance Security Fund (“WISF”).
2. On information and belief, actions at law, suits in equity, special proceedings, administrative proceedings, and other proceedings involving Wisconsin Reinsurance Corporation (“WRC”) and its wholly owned subsidiary, 1st Auto & Casualty Insurance Company (“1st Auto”), or their affiliates or successors in interest and/or pertaining to insureds or policyholders of WRC and 1st Auto who are residents of Wisconsin were pending at the time of the January 1, 2024 effective date of the Order Terminating Rehabilitation and Order for Liquidation with Finding of Insolvency, entered by this Court on January 2, 2024 (Dkt. No. 22, the “Liquidation Order”),

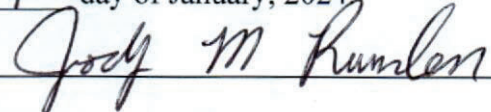
have been commenced since the filing of the Liquidation Order, or are now threatened or contemplated to be filed or commenced.

3. Such actions, suits, and proceedings constitute or will constitute interference with the WISF or with its administrative proceedings, the institution or further prosecution of actions or proceedings involving WRC and 1st Auto or in which the WISF is obligated to defend a party, the obtaining of a preference, judgment, garnishment, or lien against WRC and/or 1st Auto or their assets, or other action that might prejudice the rights of WRC and 1st Auto policyholders or insureds or the administration of the liquidation or WISF proceedings in the above-captioned matter.

4. This affidavit is made for the purpose of applying to the Court for an order as set forth in the Application for Injunctive Order under Wis. Stat. § 646.15.


Allan Patek

Subscribed and sworn to before me this
4th day of January, 2024


Jody M Runden

Notary Public, Dane County, Wisconsin
My Commission expires October 26, 2025



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State Bar No. 1050029
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